

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

JESSICA GRINGAS *et al.*,

Plaintiffs,

v.

**VICTORY PARK CAPITAL
ADVISORS, LLC, *et al.*,**

Defendants.

No. 5:17-cv-00233

**DEFENDANT HAYNES INVESTMENTS, LLC'S
MOTION TO DISMISS**

Defendant Haynes Investments, LLC (“Haynes Investments”), through counsel, respectfully moves the Court for an Order dismissing Counts One, Two, Five, and Six of Plaintiffs’ Complaint under Rules 12(b)(2), 12(b)(6), and 12(b)(7) of the Federal Rules of Civil Procedure. The grounds for this motion are set forth in the accompanying Memorandum of Law.

Dated: October 25, 2019

Respectfully submitted,

By: /s/ Jonathan P. Boughrum
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